

From: Ragsdale, Dave (ECY)
Sent: Wednesday, May 20, 2009 3:26 PM
To: Snouwaert, Elaine (ECY)
Cc: Joy, Joe (ECY); Mann.Laurie@epamail.epa.gov
Subject: FW: Hangman comments

Hey Elaine. I'm really rushing to complete a couple of other project before this Friday and do not have significant comments (having already commented on previous draft elements of the Hangman TMDL). I sincerely appreciate that you did your best to accommodate input from your EPA 'friends'. I'll kick the dead animal once more about getting TMDLs for the TSS work but have no expectation that it will move. So, please call if my input is confusing. I also included Laurie's comments below. Thanks, Dave.

?Delete "current" from first sentence after figure ES4?

Table ES7 refers to 303(d) listed waters and sediment. Although the entire watershed could have been listed as impaired for excess sediment (TSS), there are actually only 4 sediment related listings which are for turbidity. I understand the presentation here, but I felt obliged to take the opportunity to comment about connecting sediment with an approvable TMDLs (many beans are not being counted). Hangman Creek at Bradshaw Road, Little Hangman Creek, Rattler Run Creek, Rock Creek at Jackson Road. Is it possible to identify the many water body segments by Ecology's current listing convention that are considered impaired in the mainstem and major catchments (per Table 31) and addressed with TSS targets **even if they are not being considered as TMDLs**?

Laurie had questions about presenting a better linkage in the TMDL between TSS and the actual sediment related listing (which is for turbidity (see her comments below for specifics)). Joe reminded me of discussion about the variable relationship between these two parameters somewhere around page 126. Figure 29 indicates there is an approximate 1:1 relationship between TSS and turbidity.

From: Mann.Laurie@epamail.epa.gov [mailto:Mann.Laurie@epamail.epa.gov]
Sent: Tuesday, May 19, 2009 4:33 PM
To: Ragsdale, Dave (ECY)
Subject: Hangman comments

Dave,

I've finished reading the sediment portion of the Hangman TMDL. At a minimum, EPA should approve the TSS TMDLs that have been developed for the 4 turbidity listings (see my related comment 3. below). If we want to make "impaired but unlisted" determinations, I think you would need figure out how many sampling sites there are (I didn't notice how many; not sure if that's easy to find in the TMDL), and then use the "Severity Score Greater than 4" criteria to determine impairment for those locations that have data. Either way, we could clearly say in our approval that all of the allocations in Table 31 are needed in order to meet water quality standards.

If you have other thoughts I would be interested in talking with you.

Here are a few comments that you can add to your comments, if appropriate.

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1. Please update the 303(d) list discussions to reflect EPA's approval of the 2008 list. For example, on page 13, 3rd paragraph, the 2008 list is referred to as "proposed." See also Table ES1 on page 14, and Table 2 on page 42.
 2. On page 41, consider eliminating Table 1. Please update Table 2 to include the 2008 turbidity listings.
 3. In the analytical discussion of the sediment TMDL (page 125), the draft TMDL states that "this TMDL will set allocations for TSS to address the impairment of the narrative criteria." Don't the TSS allocations also address the turbidity impairments? If so, please clearly state this.

thanks - - you did a great job working with Ecology on this TMDL,
lbm

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